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October 15, 2014

By ECF

Mr. James Gatta, AUSA
Mr. Anthony Capazzola, AUSA
Mr. Nathan Riley, AUSA
United States Attorney's Office
Eastern District of New York
217 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Michael Grimm
Case No. 14-248-PKC-RML

Mssrs. Gatta, Capazzola, and Riley:

The government has recently produced Section 3500 Materials, namely recordings made by a government informant and a third party. The recordings reference numerous text messages between the government informant and the individual he recorded. We believe these recordings are also Section 3500 Materials and potential *Giglio*. In order to place the recently produced recordings in context, we are requesting the immediate production of these text messages.

Sincerely,

/s Jeffrey A. Neiman

Jeffrey A. Neiman
Daniel Rashbaum

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Counsel for Mr. Grimm

Cc: Clerk of the Court (PKC)(by ECF)